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13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 IN RE LITHIUM ION BATTERIES
20 ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)

MDL No. 2420

22 This Document Relates to:

ADMINISTRATIVE MOTION TO FILE
UNDER SEAL

23 ALL INDIRECT PURCHASER ACTIONS

24 DATE ACTION FILED: Oct. 3, 2012

1 Indirect Purchaser Plaintiffs (IPPs) bring this administrative motion pursuant to Civil Local
 2 Rule 7-11 and 79-5, to file under seal the following documents:

- 3 1. Indirect Purchaser Plaintiffs' Renewed Motion For Class Certification;
- 4 2. Supplemental Expert Report of Edward E. Leamer, Ph.D. and;
- 5 3. Exhibit 260 through Exhibit 273, and Exhibit 276 through Exhibit 280 to the
 Declaration of Shana E. Scarlett in Support of Indirect Purchaser Plaintiffs' Renewed
 Motion for Class Certification.

8 The above documents contain information designated by defendants as "Confidential," or
 9 "Highly Confidential" under the Stipulated Protective Order ("Protective Order") in place in this
 10 action.¹ The Protective Order requires that information designated as confidential "qualify for
 11 protection under standards developed under Fed. R. Civ. P. 26(c)."² In turn, under Rule 26(c), a
 12 Court may require "that a trade secret or other confidential research, development, or commercial
 13 information not be revealed or be revealed only in a specified way."³

14 Pursuant to the Protective Order and Civil Local Rule 79-5(d), the designating parties must
 15 now demonstrate that the designated information is sealable or must withdraw the designation of
 16 confidentiality.

17 DATED: September 26, 2017

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26 ¹ Stipulated Protective Order, May 17, 2013, ECF No. 193.

27 ² *Id.*, ¶ 2.3.

28 ³ Fed. R. Civ. P. 26(c)(1)(G).

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2 DATED: September 26, 2017

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